

WJC 12/30/13
MWC:2012R00452

FILED
U.S. DISTRICT COURT
DISTRICT OF MARYLAND

2014 JAN 2
**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND**

CLERK'S OFFICE
AT BALTIMORE
BY _____ JTY

UNITED STATES OF AMERICA

v.

RICHARD LEE

Defendant.

CRIMINAL NO. JFM-14-02

**(Transportation with Intent to Engage
in Criminal Sexual Activity, 18 U.S.C.
§ 2423(a); Receipt of Child
Pornography, 18 U.S.C. § 2252(a)(2);
Aggravated Identity Theft, 18 U.S.C.
1028A; Aiding & Abetting, 18 U.S.C.
§ 2; Forfeiture, 18 U.S.C. § 2253)**

INDICTMENT

COUNT ONE

(Transportation with Intent to Engage in Criminal Sexual Activity)

The Grand Jury for the District of Maryland charges that:

On or about October 31, 2011, in the District of Maryland, and elsewhere, the defendant,

RICHARD LEE,

did knowingly transport an individual, who had not attained the age of 18 years, in interstate commerce, with intent that the individual engage in any sexual activity for which any person can be charged with a criminal offense, to wit: the defendant gave a bus ticket to T.F., 16-year old female, to travel from Maryland to Florida with the intent to have sexual intercourse with T.F. in Florida, where it is a crime for anyone older than 23 years to have sexual intercourse with a person 16-years old or younger.

18 U.S.C. § 2423(a)

18 U.S.C. § 2

COUNT TWO
(Receipt of Child Pornography)

The Grand Jury for the District of Maryland further charges that:

In or about December 2011, in the District of Maryland, and elsewhere, the defendant,

RICHARD LEE,

did knowingly receive any visual depiction using any means and facility of interstate and foreign commerce, and that had been mailed, shipped and transported in and affecting interstate and foreign commerce, and which contained materials which had been so mailed, shipped and transported, by any means including by computer, the production of which involved the use of a minor engaged in sexually explicit conduct, as defined in Title 18, United States Code, Section 2256(2), and such depiction being of such conduct, that is, the defendant received visual depictions on a Western Digital Passbook external hard drive, serial number WXD0A8979612, of minors engaging in sexually explicit conduct, including, but not limited to, a file with the following title: "PEDO-PTCH-JENNY 9yo daughter-zoo 5yo girl dog and man 2007 se_(1).avi.", a movie file depicting a young girl with her arms and legs bound while she is blind-folded and her legs are spread apart, while a large brown canine licks her vagina and while she performs oral sex on an adult male penis.

18 U.S.C. §§ 2252(a)(2) & 2256

COUNT THREE
(Aggravated Identity Theft)

The Grand Jury for the District of Maryland further charges that:

In or about December 2011, in the District of Maryland, and elsewhere, the defendant,

RICHARD LEE,

did knowingly transfer, possess, and use, without lawful authority, a means of identification of another person, to wit, the North Dakota driver's license number and date of birth of A.H., (XXX-XX-1249) and (XX-X3-1997) respectively, during and in relation to a violation of Title 18, United States Code, Section 1028(a)(1), to wit: the defendant knowingly and without lawful authority produced a false identification document in the form of a North Dakota driver's license.

18 U.S.C. §§ 1028A(a)(1) & (c)(4)

FORFEITURE

1. The allegations contained in Count Two of this Indictment are incorporated here for the purpose of alleging forfeitures pursuant to Title 18, United States Code, § 2253.

2. Pursuant to Title 18, United States Code, § 2253, upon conviction of an offense in violation of Title 18, United States Code, § 2252, the defendant,

RICHARD LEE,

shall forfeit to the United States of America:

a. Any visual depiction described in Title 18, United States Code, §§ 2251, 2251A, or 2252, or any book, magazine, periodical, film, videotape, or other matter which contains any such visual depiction, which was produced, transported, mailed, shipped or received in violation of Title 18, United States Code, Chapter 110;

b. Any property, real or personal, constituting or traceable to gross profits or other proceeds obtained from the offense; and

c. Any property, real or personal, used or intended to be used to commit or to promote the commission of the offense.

3. The property to be forfeited includes, but is not limited to an Apple MacBook Pro Model A1278, serial number C02GH44PDRJ7; a MacBook Model A1181, serial number W8T218G7YA3; and a Western Digital external Passbook hard drive, serial number WXD0A8979612, and any property traceable to such property.

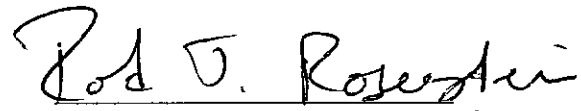
4. If any of the property described above, as a result of any act or omission of the defendant:

a. has been placed beyond the jurisdiction of the court;

b. has been substantially diminished in value; or

c. has been commingled with other property which cannot be divided without difficulty, the United States of America shall be entitled to forfeiture of substitute property pursuant to Title 21, United States Code, § 853(p), as incorporated by Title 18, United States Code, § 2253(b) and by Title 28, United States Code, § 2461(c).

18 U.S.C. § 2253; F.R.Crim.P. 32.2(a)


Rod J. Rosenstein
United States Attorney *by HWC*

A TRUE BILL:

SIGNATURE REDACTED

Foreperson

1/2/14
Date